

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTSFILED  
CLERK'S OFFICE

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AMY RIVERA, ADMINISTRATRIX OF )  
 THE ESTATE OF SHADIAMAN HUACON, )  
 ESSEX PROBATE COURT DOCKET )  
 #02P-1675AD1 )  
Plaintiff )  
 )  
 v. )  
 )  
 UNITED STATES OF AMERICA, )  
Defendant )

U.S. DISTRICT COURT  
DISTRICT OF MASS.  
Docket #03CV-12435RWZ

**PLAINTIFF'S INITIAL DISCLOSURE**

Pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure, the plaintiff makes the following initial disclosures:

(a) names, addresses and telephone numbers of each individual likely to have discoverable information relevant to disputed facts alleged with particularity in the pleadings, identifying the subjects of the information.

1. Amy Rivera, 25 Jade Street, Apt. 26, Methuen, MA 01844; Telephone: 978-685-2510;
2. Kathryn Hollett, M.D., 130 Parker Street, Lawrence, MA; Telephone: 978-475-5213;
3. Mark J. Rieumont, M.D., Radiologist, Lawrence General Hospital, 1 General Street, Lawrence, MA; Telephone: 978-683-4000 x2525;
4. Alan G. Pratt, M.D., Radiologist, Saints Memorial Medical, Lowell, MA; Telephone: 978-946-8237;
5. Ross S. Berkowitz, M.D., Brigham & Women's Hospital, 75 Francis Street, Boston, MA; Telephone: 617-732-8844;

6. J. Siddigi, MD., Greater Lawrence Family Health Center, 130 Parker Street, Lawrence, MA; Telephone: 978-686-3017;

7. Blair Roberts, M.D., Lawrence General Hospital, 1 General Street, Lawrence, MA; Telephone: 978-683-4000 2660;

8. Patrick Sabia, M.D., Lawrence General Hospital, 1 General Street, Lawrence, MA; Telephone:

9. Maria Dienhart, M.D., Lawrence General Hospital, 1 General Street, Lawrence, MA; Telephone:

(b) a copy, or description by category and location of, documents, data computation and tangible things in the possession, custody or control of the party that are relevant to the disputed facts with particularity in the pleading.

We are in possession of medical records received from Lawrence General Hospital which also include records from the Greater Lawrence Family Health Center, bate stamped Rivera 1 through Rivera and the autopsy report bate stamped Rivera 57 through Rivera 61.

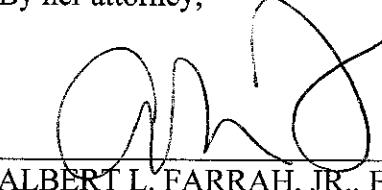
(c) a computation of any category of damages claimed by the disclosing party, making available for inspection and copying as under Rule 34 the documents or other evidentiary material, not privileged or protected from disclosure, on which such computation is based, including materials bearing on the nature and extent of injuries suffered;

Plaintiff will sign authorizations so that defendant may request medical bills.

(d) for inspection and copying as under Rule 34 any insurance agreement under which any person carrying on an insurance business may be liable to satisfy part or all of a judgment which may be entered in the action or to indemnify or reimburse for payments made to satisfy the judgment.

None exist.

Plaintiff  
By her attorney,



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ALBERT L. FARRAH, JR., ESQ.  
One Washington Mall  
Boston, MA 02108  
(617)742-7766  
B.B.O. #159340

CERTIFICATE OF SERVICE

SUFFOLK, SS

*June  
May 16, 2004*

A copy of Plaintiff's Initial Disclosure was today faxed and mailed to Rayford A. Farquhar, Assistant U.S. Attorney, 1 Courthouse Way, Suite 9200, Boston, MA 02210.



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Albert L. Farrah, Jr., Esq.